




From: Brian Pollock brian@fairlawattorney.com 
Subject: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 10:53 AM
To: Michael Kaufman michael@mkaufmanpa.com, Elizabeth Perez elizabeth@perezhealthlaw.com
Cc: Juan Aragon juan@fairlawattorney.com

Hi Michael and Elizabeth,

Here are the drafts I prepared... please markup any proposed changes/revisions

Please advise, as I'm on the road as of 11:30am,

**Agreed Mot to Disburse
(Valdivieso).docx**




**Order GR Agreed Mot to Disburse
(Valdivieso).docx**



**Release Agreement (Valdivieso
Figuera).docx**



Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

From: Elizabeth Perez elizabeth@plglawoffice.com 
Subject: RE: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 11:00 AM
To: Brian Pollock brian@fairlawattorney.com, Michael Kaufman michael@mkaufmanpa.com
Cc: Juan Aragon juan@fairlawattorney.com

EP

Good morning Brian,

Thank you for sending. As we discussed yesterday, my client will not agree to releasing \$100k to you as the monies in this account is required to meet her company's payroll.

In the spirit of cooperation, I will, however, revisit this issue with her again today.

If she rejects this proposed agreement, we will proceed to file our emergency motion to dissolve the writ.

Sincerely,

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com



Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>
Sent: Thursday, September 26, 2024 10:53 AM
To: Michael Kaufman <michael@mkaufmanpa.com>; Elizabeth Perez <elizabeth@plglawoffice.com>
Cc: Juan Aragon <juan@fairlawattorney.com>
Subject: Valdivieso Figuera vs. All VIP Care - Proposed Docs


Hi Michael and Elizabeth,

Here are the drafts I prepared... please markup any proposed changes/revisions

Please advise, as I'm on the road as of 11:30am,

Brian H. Pollock, Esq.

FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

From: Elizabeth Perez elizabeth@plglawoffice.com 
Subject: RE: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 11:14 AM
To: Brian Pollock brian@fairlawattorney.com
Cc: Juan Aragon juan@fairlawattorney.com, Michael Kaufman michael@mkaufmanpa.com

EP

Brian,

I just called you but it went to vm. there is a glaring problem with your writ. It is not based on a final judgment. See [Pineiro v. Am. Express Card Servs. Co., 105 So. 3d 614, 2013 Fla. App. LEXIS 570 \(Fla. 4th DCA 2013\).](#)

You need to withdraw it immediately, do whatever you need to do to undo the funds being frozen because this is disrupting my client's business. If you do not proceed to withdraw it immediately, we will file our Emergency Motion To Dissolve the Writ, and a 57.105 notice to you.

Sincerely,

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com



Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>
Sent: Thursday, September 26, 2024 10:53 AM
To: Michael Kaufman <michael@mkaufmanpa.com>; Elizabeth Perez <elizabeth@plglawoffice.com>
Cc: Juan Aragon <juan@fairlawattorney.com>
Subject: Valdivieso Figuera vs. All VIP Care - Proposed Docs

Hi Michael and Elizabeth,

Here are the drafts I prepared... please markup any proposed changes/revisions

Please advise, as I'm on the road as of 11:30am,

Brian H. Pollock, Esq.

FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com



From: Brian Pollock brian@fairlawattorney.com
Subject: Re: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 12:15 PM
To: Elizabeth Perez elizabeth@plglawoffice.com
Cc: Juan Aragon juan@fairlawattorney.com, Michael Kaufman michael@mkaufmanpa.com

Elizabeth,

Your client lost all credibility today. If she can come up with \$100k (\$50k more than yesterday) she can come up with \$150k to cover the remaining payroll. I'm not concerned about bankruptcy anymore...

Your client should be sending me a bottle of Pappy or Harlan Estate for agreeing to release the writ for anything less than the \$150k.

Instead, and in response to me agreeing to allow her to use an extra \$50k for the next month, by only agreeing to get \$100k now, I get another poorly veiled excuse to delay and avoid paying... Same motive, different tactic.

Based on your response, the current offer is revised to \$105k now and \$45k in 30 (only changes).

At 1pm, this current proposal (105/45) expires. Afterwards, the only offer will be for the parties to submit an agreed emergency motion for PNC to immediately disburse \$150k to my firm, the statutory fee to PNC's counsel, and the remainder to the defendants, for Defendants to file a satisfaction of judgment for the costs awarded to them within 3 business days of their access to the money held by/at PNC, and I'll file a satisfaction for the fees/costs within 3 business days after the funds from PNC clear my firm's operating account.

In regards to the case you cited, the writ I filed was for the amount awarded, nothing more, distinguishing it from the case you cited.

If you file a motion, please indicate in the conferral statement that "Plaintiff's counsel opposes the relief requested, believes the writ was issued properly for the amount awarded, disagrees that there is an emergency, and is **currently traveling with his family to visit his son for parents weekend**".

Best,

Brian H. Pollock, Esq.
FairLaw Firm
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
T: 305.230.4884
D: 305.230.4822
F: 305.230.4844
brian@fairlawattorney.com
www.fairlawattorney.com

On Thu, Sep 26, 2024 at 11:14 AM Elizabeth Perez <elizabeth@plglawoffice.com> wrote:

Brian,

I just called you but it went to vm. there is a glaring problem with your writ. It is not based on a final judgment. See [Pineiro v. Am. Express Card Servs. Co., 105 So. 3d 614, 2013 Fla. App. LEXIS 570 \(Fla. 4th DCA 2013\)](#).

You need to withdraw it immediately, do whatever you need to do to undo the funds being frozen because this is disrupting my client's business. If you do not proceed to withdraw it immediately, we will file our Emergency Motion To Dissolve the Writ, and a 57.105 notice to you.

Sincerely,

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

[15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027](#)

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com



Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>
Sent: Thursday, September 26, 2024 10:53 AM
To: Michael Kaufman <michael@mkaufmanpa.com>; Elizabeth Perez <elizabeth@plglawoffice.com>
Cc: Juan Aragon <juan@fairlawattorney.com>
Subject: Valdivieso Figuera vs. All VIP Care - Proposed Docs

Hi Michael and Elizabeth,

Here are the drafts I prepared... please markup any proposed changes/revisions

Please advise, as I'm on the road as of 11:30am,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822

Ofc: 305.230.4884
[135 San Lorenzo Avenue](#)
[Suite 770](#)
[Coral Gables, FL 33146](#)
brian@fairlawattorney.com
www.fairlawattorney.com

From: Elizabeth Perez elizabeth@plglawoffice.com
Subject: RE: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 1:30 PM
To: Brian Pollock brian@fairlawattorney.com
Cc: Juan Aragon juan@fairlawattorney.com

EP

Brian,

Despite the fact that you have defective writ issued by the Clerk, not based on a Final Judgment, my client is desperate and is pressured to have to accept your proposal.

That said, I will review the documents that you sent to Mr. Kaufman, and I will provide you a response on any potential revision. By the way, Mr. Kaufman is not her attorney on this case – so all documents and communications must include me.

Sincerely,

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com



Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>
Sent: Thursday, September 26, 2024 10:53 AM
To: Michael Kaufman <michael@mkaufmanpa.com>; Elizabeth Perez <elizabeth@plglawoffice.com>
Cc: Juan Aragon <juan@fairlawattorney.com>
Subject: Valdivieso Figuera vs. All VIP Care - Proposed Docs

Hi Michael and Elizabeth,

Here are the drafts I prepared... please markup any proposed changes/revisions

Please advise, as I'm on the road as of 11:30am,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305 230 4822

Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

From: Elizabeth Perez elizabeth@plglawoffice.com
Subject: RE: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 1:46 PM
To: Brian Pollock brian@fairlawattorney.com
Cc: Juan Aragon juan@fairlawattorney.com, Sebastian Suarez paralegal@plglawoffice.com

Brian,

Attached are the proposed revisions to the motion and order. The changes added is to direct the bank to release the funds within 24 hours. Other than that, everything else is the same.

Sincerely,

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com



Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>
Sent: Thursday, September 26, 2024 10:53 AM
To: Michael Kaufman <michael@mkaufmanpa.com>; Elizabeth Perez <elizabeth@plglawoffice.com>
Cc: Juan Aragon <juan@fairlawattorney.com>
Subject: Valdivieso Figuera vs. All VIP Care - Proposed Docs

Hi Michael and Elizabeth,

Here are the drafts I prepared... please markup any proposed changes/revisions

Please advise, as I'm on the road as of 11:30am,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue

100 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

Order GR Agreed Mot to Disburse
(Valdivieso) v2.docx



Agreed Mot to Disburse
(Valdivieso) v2.docx



From: Brian Pollock brian@fairlawattorney.com
Subject: Re: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 2:23 PM
To: Elizabeth Perez elizabeth@plglawoffice.com
Cc: Juan Aragon juan@fairlawattorney.com, Sebastian Suarez paralegal@plglawoffice.com



About to take off, but should have wifi in the air. Is there a change to the motion? I only saw a change to the Order, which I've further revised to reflect 1 business day. let me know if there were any changes to the motion.

Order GR Agreed Mot to Disburse
(Valdivieso) v3.docx



I presume no changes to the agreement?

let me know,

Thanks,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Sep 26, 2024, at 1:46 PM, Elizabeth Perez <elizabeth@plglawoffice.com> wrote:

Brian,

Attached are the proposed revisions to the motion and order. The changes added is to direct the bank to release the funds within 24 hours. Other than that, everything else is the same.

Sincerely,

<image001.png>

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com

<image002.png>

Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>
Sent: Thursday, September 26, 2024 10:53 AM

Sent: Thursday, September 28, 2023 10:00 AM

To: Michael Kaufman <michael@mkaufmanpa.com>; Elizabeth Perez <elizabeth@plglawoffice.com>

Cc: Juan Aragon <juan@fairlawattorney.com>

Subject: Valdivieso Figuera vs. All VIP Care - Proposed Docs

Hi Michael and Elizabeth,

Here are the drafts I prepared... please markup any proposed changes/revisions

Please advise, as I'm on the road as of 11:30am,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

<Order GR Agreed Mot to Disburse (Valdivieso) v2.docx><Agreed Mot to Disburse (Valdivieso) v2.docx>

From: Elizabeth Perez elizabeth@plglawoffice.com
Subject: Re: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 2:28 PM
To: Brian Pollock brian@fairlawattorney.com
Cc: Juan Aragon juan@fairlawattorney.com, Sebastian Suarez paralegal@plglawoffice.com

See Paragraph 8c of the motion.

Sent from my iPhone

On Sep 26, 2024, at 2:23 PM, Brian Pollock <brian@fairlawattorney.com> wrote:

About to take off, but should have wifi in the air. Is there a change to the motion? I only saw a change to the Order, which I've further revised to reflect 1 business day. let me know if there were any changes to the motion.

I presume no changes to the agreement?

let me know,

Thanks,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Sep 26, 2024, at 1:46 PM, Elizabeth Perez <elizabeth@plglawoffice.com> wrote:

Brian,

Attached are the proposed revisions to the motion and order. The changes added is to direct the bank to release the funds within 24 hours. Other than that, everything else is the same.

Sincerely,

<image001.png>

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com

<image002.png>

Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>

Sent: Thursday, September 26, 2024 10:53 AM

Sent: Thursday, September 20, 2024 10:00 AM

To: Michael Kaufman <michael@mkaufmanpa.com>; Elizabeth Perez <elizabeth@plglawoffice.com>

Cc: Juan Aragon <juan@fairlawattorney.com>

Subject: Valdivieso Figuera vs. All VIP Care - Proposed Docs

Hi Michael and Elizabeth,

Here are the drafts I prepared... please markup any proposed changes/revisions

Please advise, as I'm on the road as of 11:30am,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

<Order GR Agreed Mot to Disburse (Valdivieso) v2.docx><Agreed Mot to Disburse (Valdivieso) v2.docx>

<Order GR Agreed Mot to Disburse (Valdivieso) v3.docx>

From: Elizabeth Perez elizabeth@plglawoffice.com
Subject: RE: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 3:13 PM
To: Brian Pollock brian@fairlawattorney.com
Cc: Juan Aragon juan@fairlawattorney.com, Sebastian Suarez paralegal@plglawoffice.com

Perfect.

If it's possible and you are amenable to it, I can also file it since it's a joint motion and agreed order, and given that time is of the essence.

Let me know.

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com



Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>
Sent: Thursday, September 26, 2024 2:53 PM
To: Elizabeth Perez <elizabeth@plglawoffice.com>
Cc: Juan Aragon <juan@fairlawattorney.com>; Sebastian Suarez <paralegal@plglawoffice.com>
Subject: Re: Valdivieso Figuera vs. All VIP Care - Proposed Docs

As soon As I can get to my laptop, I'll get it all assembled and filed. I'll also change the language to reflect I conferred with you (not Kaufman) and that PNC told Defendants they can release within 24-48 hrs of receipt of the order.

Brian H. Pollock, Esq.
FairLaw Firm
Ofc: 305.230.4884
Dir: 305.230.4822
Fax: 305.230.4844
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Sep 26, 2024, at 2:48 PM, Elizabeth Perez
<elizabeth@plglawoffice.com> wrote:

They told her they can do it within 24-48 hours. The 1 business day language is fine.

Thanks for responding and working on this even as you are flying 30k feet in the air.

<image001.png>

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com

<image002.png>

Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>

Sent: Thursday, September 26, 2024 2:33 PM

To: Elizabeth Perez <elizabeth@plglawoffice.com>

Cc: Juan Aragon <juan@fairlawattorney.com>; Sebastian Suarez
<paralegal@plglawoffice.com>

Subject: Re: Valdivieso Figuera vs. All VIP Care - Proposed Docs

Gotcha,

I think we make it consistent - within one business day - but have your or your client confirmed the bank can do that quick of a turnaround ? If so, it's probably helpful to include that info in the motion (counsel for defs called and was told.....).

Let me know,

Brian H. Pollock, Esq.

FairLaw Firm

Ofc: 305.230.4884

Dir: 305.230.4822
Fax: 305.230.4844
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Sep 26, 2024, at 2:28 PM, Elizabeth Perez
<elizabeth@plglawoffice.com> wrote:

See Paragraph 8c of the motion.

Sent from my iPhone

On Sep 26, 2024, at 2:23 PM, Brian Pollock
<brian@fairlawattorney.com> wrote:

About to take off, but should have wifi in the air. Is there a change to the motion? I only saw a change to the Order, which I've further revised to reflect 1 business day. let me know if there were any changes to the motion.

I presume no changes to the agreement?

let me know,

Thanks,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Sep 26, 2024, at 1:46 PM,
Elizabeth Perez

<elizabeth@plglawoffice.com> wrote:

Brian,

Attached are the proposed revisions to the motion and order. The changes added is to direct the bank to release the funds within 24 hours. Other than that, everything else is the same.

Sincerely,

<image001.png>

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 I

Pembroke Pines, Florida 33027

Phone: 305.709.0888

I Fax: 305.709.0888

www.perezhealthlaw.com

<image002.png>

Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock

<brian@fairlawattorney.com>

Sent: Thursday, September 26, 2024
10:53 AM

To: Michael Kaufman

<michael@mkaufmanpa.com>; Elizabeth
Perez <elizabeth@plglawoffice.com>

Cc: Juan Aragon

<juan@fairlawattorney.com>

Subject: Valdivieso Figuera vs. All VIP
Care - Proposed Docs

Hi Michael and Elizabeth,

Here are the drafts I prepared...
please markup any proposed
changes/revisions

Please advise, as I'm on the road as of 11:30am,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

<Order GR Agreed Mot to Disburse
(Valdivieso) v2.docx><Agreed Mot to
Disburse (Valdivieso) v2.docx>

<Order GR Agreed Mot to Disburse (Valdivieso)
v3.docx>



From: Brian Pollock brian@fairlawattorney.com
Subject: Re: Valdivieso Figuera vs. All VIP Care - Proposed Docs
Date: September 26, 2024 at 3:32 PM
To: Elizabeth Perez elizabeth@plglawoffice.com
Cc: Juan Aragon juan@fairlawattorney.com, Sebastian Suarez paralegal@plglawoffice.com

Hi Elizabeth,

Just got wifi - was stuck on the runway during a rainband for a while...

I've revised the Agreed Motion, which now just needs your signature, and removed the 7.1 statement (since its joint) and included language consistent with what Defendants found out from PNC Bank.

**Agreed Mot to Disburse
(Final) Valdivieso).docx**
70 KB



**Order GR Agreed Mot to Disburse
(Proposed) (Valdivieso).docx**
22 KB



**187 Writ of Garnishment
(Valdivieso) (Not public ...**
73 KB



I've also attached the proposed Order, and the Writ of Garnishment. Please file with all Exhibits (including the entire Agreement with signature page) and the proposed Order, and submit to Judge Dimitrouleas.

When you send the Order, when entered, to PNC Bank please also include my firm's wire instructions - attached - so the bank can wire the funds to my firm as well.

OPERATING WIRE INFO.pdf
68 KB



Thanks,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Sep 26, 2024, at 3:13 PM, Elizabeth Perez <elizabeth@plglawoffice.com> wrote:

Perfect.

If it's possible and you are amenable to it, I can also file it since it's a joint motion and agreed order, and given that time is of the essence.

Let me know

LET ME KNOW.

<image001.png>

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com

<image002.png>

Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>

Sent: Thursday, September 26, 2024 2:53 PM

To: Elizabeth Perez <elizabeth@plglawoffice.com>

Cc: Juan Aragon <juan@fairlawattorney.com>; Sebastian Suarez <paralegal@plglawoffice.com>

Subject: Re: Valdivieso Figuera vs. All VIP Care - Proposed Docs

As soon As I can get to my laptop, I'll get it all assembled and filed. I'll also change the language to reflect I conferred with you (not Kaufman) and that PNC told Defendants they can release within 24-48 hrs of receipt of the order.

Brian H. Pollock, Esq.

FairLaw Firm

Ofc: 305.230.4884

Dir: 305.230.4822

Fax: 305.230.4844

135 San Lorenzo Avenue

Suite 770

Coral Gables, FL 33146

brian@fairlawattorney.com

www.fairlawattorney.com

On Sep 26, 2024, at 2:48 PM, Elizabeth Perez
<elizabeth@plglawoffice.com> wrote:

They told her they can do it within 24-48 hours. The 1 business day language is fine.

Thanks for responding and working on this even as you are flying 30k feet in

the air.

<image001.png>

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 | Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax: 305.709.0888

www.perezhealthlaw.com

<image002.png>

Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock <brian@fairlawattorney.com>

Sent: Thursday, September 26, 2024 2:33 PM

To: Elizabeth Perez <elizabeth@plglawoffice.com>

Cc: Juan Aragon <juan@fairlawattorney.com>; Sebastian Suarez <paralegal@plglawoffice.com>

Subject: Re: Valdivieso Figuera vs. All VIP Care - Proposed Docs

Gotcha,

I think we make it consistent - within one business day - but have your or your client confirmed the bank can do that quick of a turnaround ? If so, it's probably helpful to include that info in the motion (counsel for defs called and was told.....).

Let me know,

Brian H. Pollock, Esq.

FairLaw Firm

Ofc: 305.230.4884

Dir: 305.230.4822

Fax: 305.230.4844

135 San Lorenzo Avenue

Suite 770

Coral Gables, FL 33146

brian@fairlawattorney.com

www.fairlawattorney.com

On Sep 26, 2024, at 2:28 PM, Elizabeth Perez

<elizabeth@plglawoffice.com> wrote:

See Paragraph 8c of the motion.

Sent from my iPhone

On Sep 26, 2024, at 2:23 PM, Brian Pollock
<brian@fairlawattorney.com> wrote:

About to take off, but should have wifi in the air.
Is there a change to the motion? I only saw a
change to the Order, which I've further revised
to reflect 1 business day. let me know if there
were any changes to the motion.

I presume no changes to the agreement?

let me know,

Thanks,

Brian H. Pollock, Esq.
FairLaw Firm
Dir: 305.230.4822
Ofc: 305.230.4884
135 San Lorenzo Avenue
Suite 770
Coral Gables, FL 33146
brian@fairlawattorney.com
www.fairlawattorney.com

On Sep 26, 2024, at 1:46 PM,
Elizabeth Perez
<elizabeth@plglawoffice.com>
wrote:

Brian,

Attached are the proposed revisions to
the motion and order. The changes
added is to direct the bank to release
the funds within 24 hours. Other than
that, everything else is the same.

Sincerely,

<image001.png>

Elizabeth P. Perez, Esq.

Partner

PEREZ LEGAL GROUP

15800 Pines Blvd., Suite 3210 I

Pembroke Pines, Florida 33027

Phone: 305.709.0888 | Fax:

305.709.0888

www.perezhealthlaw.com

<image002.png>

Excellence. Experience. Effective.

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

From: Brian Pollock

<brian@fairlawattorney.com>

Sent: Thursday, September 26, 2024

10:53 AM

To: Michael Kaufman

<michael@mkaufmanpa.com>;

Elizabeth Perez

<elizabeth@plglawoffice.com>

Cc: Juan Aragon

<juan@fairlawattorney.com>

Subject: Valdivieso Figuera vs. All VIP
Care - Proposed Docs

Hi Michael and Elizabeth,

Here are the drafts I prepared...
please markup any proposed
changes/revisions

Please advise, as I'm on the road as
of 11:30am,

Brian H. Pollock, Esq.
Fair Law Firm

FAIRLAW FIRM

Dir: 305.230.4822

Ofc: 305.230.4884

135 San Lorenzo Avenue

Suite 770

Coral Gables, FL 33146

brian@fairlawattorney.com

www.fairlawattorney.com

<Order GR Agreed Mot to Disburse
(Valdivieso) v2.docx><Agreed Mot to
Disburse (Valdivieso) v2.docx>

<Order GR Agreed Mot to Disburse (Valdivieso)
v3.docx>